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VIA ECF AND HAND DELIVERY

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: In re Application of Hornbeam Corporation, Case No. 1:14-mc-00424-P1

Dear Judge Broderick:

On behalf of Applicant Hornbeam Corporation (“Hornbeam”), we write in response to the Court’s Order, dated August 28, 2019 (Doc. 161), and pursuant to Rule 5(B) of Your Honor’s Individual Rules & Practices in Civil cases, to respectfully request that the Declaration that we are submitting contemporaneously with this letter be filed in redacted form. The redactions are necessary to protect confidential and privileged information concerning the basis for our Firm’s motion to withdraw as counsel to Hornbeam. Among other things, the Declaration discusses our Firm’s confidential communications with our client, as well as confidential and sensitive financial information. We have not received informed consent from Hornbeam to disclose these communications, and therefore, we believe any such disclosure would violate ABA Model Rule 1.6(a).

Pursuant to Rule 5(B) of Your Honor’s Individual Rules & Practices in Civil cases, we are delivering this letter via hand delivery and enclosing a version of our Declaration that highlights the relevant portions to be redacted. We are submitting digital copies of this letter and the highlighted Declaration via email as well. We are available at the Court’s convenience if the Court would like to discuss this letter, the Declaration, or any of the proposed redactions.

Respectfully submitted,



Michael V. Rella

Encl.